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10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

11 DANIEL COYNE, individually and on behalf of
12 those similarly situated; DAVID DENTON,
individually and on behalf of those similarly
13 situated; and SEAN BOLLIG, individually and
on behalf of those similarly situated,

14 Plaintiff(s),

15 vs.

16 LAS VEGAS METROPOLITAN POLICE
17 DEPARTMENT;

18 Defendant(s).

Case Number
2:22-cv-00475-APG-VCF

**Stipulation and Order for Extension of
Time for Plaintiffs to File Motion for
Preliminary Certification of Collective
Action**

(First Request)

19
20 Defendant Las Vegas Metropolitan Police Department (hereinafter “Defendant” or
21 “LVMPD”) by and through its attorneys of record, Nick D. Crosby, Esq. and Jordan W. Montet,
22 Esq., of the law firm of Marquis Aurbach, and James E. Whitmire, Esq. of the law firm of Santoro
23 Whitmire; and Plaintiffs Daniel Coyne, David Denton, Sean Bollig, et al. (collectively,
24 “Plaintiffs”), by and through their counsel of record, Anthony P. Sgro, Esq. and Kelly B. Stout, Esq.
25 of the law firm of Sgro & Roger, hereby stipulate and agree as follows:

26 1. On March 23, 2022, LVMPD filed a Motion to Dismiss. (ECF 7.) Plaintiffs filed
27 their Response on April 6, 2022 (ECF 10), and LVMPD filed its Reply on April 22, 2022 (ECF 23).

2. On May 13, 2022, while the Motion to Dismiss was pending, the Parties filed a [Proposed] Discovery Plan and Scheduling Order. (ECF 28.)

3. On June 1, 2022, the Court held a status hearing on the proposed discovery plan (*see* ECF 30), and ordered that if Plaintiffs' claims survive the Motion to Dismiss, Plaintiffs shall have 45 days after the entry the order deciding the Motion to Dismiss to file a motion for conditional certification of a collective action. (ECF 33.)

4. On September 21, 2022, the Court issued an Order denying LVMPD's Motion to Dismiss Plaintiffs' as to the FLSA claim (ECF 39), and Plaintiffs' currently have until November 7, 2022, to file their motion for conditional certification of a collective action.

5. The Parties have agreed to extend the deadline for Plaintiffs to file their motion for conditional certification of a collective action by four days—until November 11, 2022.

6. This extension is agreed to in good faith and is not for the purposes of delay.

SGRO & ROGER

MARQUIS AURBACH CHTD.

/s/ Kelly B. Stout

/s/ Nicholas D. Crosby

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*Attorneys for DEFENDANT LAS VEGAS
METROPOLITAN POLICE DEPARTMENT*

ORDER

Based on the Parties' foregoing Stipulation and for good cause appearing,

IT IS HEREBY ORDERED that Plaintiffs shall file their motion for conditional certification of a collective action on or before November 11, 2022.

DATED this 4th day of November, 2022.



UNITED STATES MAGISTRATE JUDGE